

King-Hackney, Ashadee

From: Ackerman, Charmagne
Sent: Tuesday, September 16, 2014 8:28 AM
To: King-Hackney, Ashadee
Subject: RE: FOIA Request EPA-R5-2014-010229
Attachments: AshtabulaTireSubpart6Ms.pdf; Washingtonstatepermit.pdf

From: Switzer, Kristen [mailto:Kristen.Switzer@epa.ohio.gov]
Sent: Thursday, June 05, 2014 4:13 PM
To: Ackerman, Charmagne
Subject: Subpart MMMMMM

Hi Charmagne.

Please find attached the section of the permit application for Ashtabula Tire Partners that states they are exempt from 40 CFR Part 63, Subpart MMMMMM. I know it is not very detailed. Let me know if you hear anything from the rule "experts" about applicability to pyrolysis units. I have also attached portions of a tire pyrolysis permit from Southwest Clean Air Agency for a facility in Washington state. The process appears to be similar to the process at Ashtabula Tire and the permit says they are exempt from the rule. Ohio has issued a number of permits for these types of facilities (none of which were ever constructed I believe). The permit issued in 2003 for Universal Purifying Technology says no NESHAPS apply but this permit pre-dates the rule. More recently issued permits (2012) for Liberation Capital VADXX in Cleveland and Akron do not cite 40 CFR Part 63, Subpart MMMMMM.

I agree that we should use emission factors obtained from actual emissions tests performed at the facility to calculate emissions rather than AP-42 emission factors. I assume you will recommend this in the formal comments and I will revise the permit language at that time (and provide you with that language in the "Response to Comments"). If you would like I can revise the terms and conditions sooner and send you the language I would use. Let me know what you prefer.

I will be out of the office tomorrow. Please let me know of anything else I can do for you.

Thanks,
Kristen

Kristen Switzer
Environmental Specialist
Division of Air Pollution Control

If your address book currently has my email as Kristen.Switzer@epa.state.oh.us please change it to Kristen.Switzer@epa.ohio.gov In the coming months, the 1st address will no longer work.



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